

ORIGINAL

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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	:	
UNITED STATES OF AMERICA	:	<u>SUPERSEDING</u>
	:	<u>INDICTMENT</u>
-v.-	:	
	:	<u>SEALED</u>
KROUCHE DELEON,	:	
WASHINGTON ORDONEZ,	:	S7 13 Cr. 811 (ALC)
a/k/a "Wacho,"	:	
JOEL PRADO,	:	
a/k/a "Fat Boy,"	:	
SHAJONNY SANTANA,	:	
GLEN PEGUERO,	:	
SHAMIR PERALTA,	:	
a/k/a "Chami," and	:	
JONATHAN RAMIREZ,	:	
a/k/a "Punani,"	:	
	:	
Defendants.	:	
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USDC SDNY DOCUMENT ELECTRONICALLY FILED DOC #: DATE FILED JAN 07 2016
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COUNT ONE

(Conspiracy to Burglarize Pharmacies)

The Grand Jury charges:

1. From at least in or about January 2011, up to and including in or about October 2012, in the Southern District of New York and elsewhere, KROUCHE DELEON, WASHINGTON ORDONEZ, a/k/a "Wacho," JOEL PRADO, a/k/a "Fat Boy," SHAJONNY SANTANA, GLEN PEGUERO, SHAMIR PERALTA, a/k/a "Chami," and JONATHAN RAMIREZ, a/k/a "Punani," the defendants, and others known and unknown, willfully and knowingly did combine, conspire, confederate, and agree together and with each other to violate Section 2118(b) of Title 18, United States Code.

2. It was a part and an object of the conspiracy that KROUCHE DELEON, WASHINGTON ORDONEZ, a/k/a "Wacho," JOEL PRADO, a/k/a "Fat Boy," SHAJONNY SANTANA, GLEN PEGUERO, SHAMIR PERALTA, a/k/a "Chami," and JONATHAN RAMIREZ, a/k/a "Punani," the defendants, and others known and unknown, would and did, without authority, enter, attempt to enter, and remain in, the business premises and property of a person registered with the Drug Enforcement Administration under Section 302 of the Controlled Substances Act, with the intent to steal materials and compounds containing a quantity of a controlled substance, the replacement cost of which to the registrant was \$500 and more, and that the person who would and did engage in such entry and attempted such entry and did remain in such premises and property would and did use a facility in interstate commerce to facilitate such entry and attempt to enter and to facilitate remaining in such premises and property, in violation of 18 U.S.C. § 2118(b).

Overt Acts

3. In furtherance of the conspiracy and to effect the illegal object thereof, the following overt acts, among others, were committed in the Southern District of New York and elsewhere:

a. On or about September 8, 2011, KROUCHE DELEON, the defendant, and co-conspirators not named herein, burglarized

a pharmacy in the vicinity of 1728 Amsterdam Avenue in Manhattan, New York, and stole controlled substances and cash.

b. On or about January 4, 2012, WASHINGTON ORDONEZ, a/k/a "Wacho," the defendant, and co-conspirators not named herein, burglarized a pharmacy in the vicinity of 1959 Westchester Avenue in the Bronx, New York, and stole controlled substances and cash.

c. On or about September 27, 2012, JOEL PRADO, a/k/a "Fat Boy," and SHAJONNY SANTANA, the defendants, and co-conspirators not named herein, burglarized a pharmacy in the vicinity of 138-38 86th Avenue in Queens, New York, and stole controlled substances and cash.

d. On or about January 27, 2011, GLEN PEGUERO, the defendant, and co-conspirators not named herein, burglarized a pharmacy in the vicinity of 57 East Kingsbridge Road in the Bronx, New York, and stole controlled substances and cash.

e. On or about April 7, 2012, SHAMIR PERALTA, a/k/a "Chami," the defendant, and co-conspirators not named herein, burglarized a pharmacy in the vicinity of 42-02B Greenpoint Avenue in Queens, New York, and stole controlled substances and cash.

f. On or about July 25, 2011, JONATHAN RAMIREZ, a/k/a "Punani," the defendant, and co-conspirators not named herein, burglarized a pharmacy in the vicinity of 1959

Westchester Avenue in the Bronx, New York, and stole controlled substances and cash.

(Title 18, United States Code, Section 2118(d).)

COUNT TWO

(Narcotics Conspiracy)

The Grand Jury further charges:

1. From at least in or about July 2011, up to and including in or about October 2012, in the Southern District of New York and elsewhere, KROUCHE DELEON, WASHINGTON ORDONEZ, a/k/a "Wacho," JOEL PRADO, a/k/a "Fat Boy," SHAJONNY SANTANA, GLEN PEGUERO, SHAMIR PERALTA, a/k/a "Chami," and JONATHAN RAMIREZ, a/k/a "Punani," the defendants, and others known and unknown, intentionally and knowingly did combine, conspire, confederate, and agree together and with each other to violate the narcotics laws of the United States.

2. It was a part and an object of the conspiracy that KROUCHE DELEON, WASHINGTON ORDONEZ, a/k/a "Wacho," JOEL PRADO, a/k/a "Fat Boy," SHAJONNY SANTANA, GLEN PEGUERO, SHAMIR PERALTA, a/k/a "Chami," JONATHAN RAMIREZ, a/k/a "Punani," the defendants, and others known and unknown, would and did distribute and possess with the intent to distribute controlled substances, in violation of Title 21, United States Code, Section 841(a)(1).

3. The controlled substances involved in the offense were quantities of various Schedule II controlled substances,

including (i) oxycodone; (ii) methamphetamine; (iii) morphine; (iv) hydromorphone; (v) methadone; and (vii) oxymorphone, all in violation of Title 21, United States Code, Section 841(b)(1)(C).

(Title 21, United States Code, Section 846.)

FORFEITURE ALLEGATIONS

4. As a result of committing the offense alleged in Count One of this Superseding Information, KROUCHE DELEON, WASHINGTON ORDONEZ, a/k/a "Wacho," JOEL PRADO, a/k/a "Fat Boy," SHAJONNY SANTANA, GLEN PEGUERO, SHAMIR PERALTA, a/k/a "Chami," and JONATHAN RAMIREZ, a/k/a "Punani," the defendants, shall forfeit to the United States, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461, any property constituting, or derived from, proceeds traceable to such offenses.

5. As a result of committing the violations of the narcotics laws of the United States offenses alleged in Count Two of this Superseding Information, KROUCHE DELEON, WASHINGTON ORDONEZ, a/k/a "Wacho," JOEL PRADO, a/k/a "Fat Boy," SHAJONNY SANTANA, GLEN PEGUERO, SHAMIR PERALTA, a/k/a "Chami," and JONATHAN RAMIREZ, a/k/a "Punani," the defendants, shall forfeit to the United States, pursuant to 21 U.S.C. § 853, any and all property constituting or derived from any proceeds said defendants obtained directly or indirectly as a result of the violation and any and all property used or intended to be used in any manner or part to commit or to facilitate the commission

of the violation alleged in Count Two of this Indictment, including but not limited to a sum in United States currency representing the amount of proceeds obtained as a result of the offense.

Substitute Assets Provision

6. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

a. cannot be located upon the exercise of due diligence;

b. has been transferred or sold to, or deposited with, a third party;

c. has been placed beyond the jurisdiction of the court;

d. has been substantially diminished in value;
or

e. has been commingled with other property which cannot be divided without difficulty;


it is the intention of the United States, pursuant to 21 U.S.C.

§ 853(p), to seek forfeiture of any other described forfeitable property.

(Title 21, United States Code, Section 853.)



FOREPERSON



PREET BHARARA *MBH*
UNITED STATES ATTORNEY

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

KROUCHE DELEON,
WASHINGTON ORDONEZ, a/k/a "Wacho,"
JOEL PRADO, a/k/a "Fat Boy,"
SHAJONNY SANTANA,
GLEN PEGUERO,
SHAMIR PERALTA, a/k/a "Chami," and
JONATHAN RAMIREZ, a/k/a "Punani,"

Defendants.

SUPERSEDING
INDICTMENT

S7 13 Cr. 811 (ALC)

(18 U.S.C. §§ 2118(d), 981; 21 U.S.C. §§ 846, 853; 28 U.S.C.
§ 2461.)

ZJ.

PREET BHARARA

United States Attorney.

For person

*1/5/16 - Filed Sealed Superseding Indictment
as A/W's issued.*

*J. Bell
USM2*